

FACT SHEET FOR NPDES PERMIT WA-002462-7 CITY OF WALLA WALLA

PERMIT MODIFICATION

SUMMARY

The Department of Ecology is proposing to modify the City of Walla Walla's National Pollutant Discharge Elimination System (NPDES) Permit No. WA 002462-7 according to the provisions of Chapter 90.48 RCW Chapter 173-220 WAC, and the Federal Clean Water Act.

Following evaluation of the existing permit and the following available information:

The City of Walla Walla is requesting an amendment to the NPDES permit (WA-002462-7) to extend the Final Metal Effluent Limits compliance date from December 31, 2003 to December 31, 2004.

They base their request on the following reasons:

1. Smith Chrome was in violation of their State Discharge Permit when tested this summer.
2. Zinc discharge from the Penitentiary has been measured as high as 426 ug/L, with this level of discharge the wastewater plant can not consistently make the final permit level of 55 ug/L for zinc. Scot Mallery is currently working with the Penitentiary and is planning to issue a State Discharge Permit. The permit will not be issued until March of 2004 or later. Also, the Penitentiary has reduced metals discharge, but still has much work to do.
3. Prior wet bioassays testing have shown 100% survival in whole effluent. This is a strong indication that the Walla Walla WWTP effluent is non toxic.
4. Current testing indicates that septage is a very significant source of metals. Preliminary data indicates that the only way to meet the metal limits next year would be to ban septic haulers. There are several funding programs that could assist the City to get the septage out of the plant and to an alternate treatment and discharge. I recommended to the City that I will work with the City throughout the next year to find a solution to this difficult problem.

The City is working on metals issues in good faith. The City has been aggressively working on this issue since the compliance date was extended last year. This additional year of extension of the compliance date will give the above project more time to succeed. They have requested that Ecology issue the metals permit extension and work with the City on a solution to the septage problem.

My recommendation is to extend the date to December 31, 2004. The permit has a statement that leaves open the possibility of meeting final metals effluent limits if controls are not in place.

The following previous supporting information applies for this permit compliance schedule change:

- Previous and on-going metals sampling for influent and effluent metals;
- Progress by the City to institute an industrial pretreatment program and enactment of an ordinance with local limits;
- On-going collection system sampling and identification of sources of priority pollutants;

- Scheduled construction of the second phase of the treatment plant up-grade; The city has submitted construction documents for bid and will be constructing UV disinfection at the facility within the next year.
- Continuation of the reliability and efficiency study of existing and alternative effluent filters;
- Existing treatment plant operational and maintenance programs and training;

The Department proposes to modify the applicant's permit for a one-year extension of the discharge of treated wastewater to waters of the State for compliance with final effluent metals limits. A tentative determination has been made that the one-year extension will provide the time needed to identify, locate, and remove sources of metals that cause the wastewater treatment plant effluent discharged to Mill Creek to exceed final metals limitations.

The current permit was issued on July 10, 2000 which allows the discharge of treated municipal wastewater from the Walla Walla Wastewater Treatment Plant to local irrigators (Gose and Blalock Irrigation Districts) from May 1st through November 30th and to Mill Creek from December 1st through April 30th. The City of Walla Walla owns a secondary municipal activated sludge/trickling filter wastewater treatment plant designed to handle an average maximum daily flow of 9.6 million gallons per day (MGD). The current maximum monthly discharge to Mill Creek (2003) is 6.69 MGD. In 2000, the operations and maintenance activities at the treatment plant were contracted out by the City to OMI, Inc.

The City submitted a report on the Survey of Copper, Lead, Mercury, and Zinc in the Walla Walla Wastewater Treatment Plant Effluent and Mill Creek Report, dated August 5, 2002. This report presents the latest clean metals sampling results and analysis that supports the request that additional time is needed to complete development of local limits and metals sampling. The report shows that lead, mercury, and silver does not have a reasonable potential to exceed effluent limitations established in the permit. Therefore, monitoring will continue on copper and zinc until a pretreatment ordinance is adopted and the concentration of these two metals can be reduced and no longer will have a reasonable potential to exceed final permit effluent limits. Based upon the proposed actions and conclusions of this report, the modification to the scheduled date is reasonable.

The wastewater following treatment must meet the requirements of the Washington State Water Pollution Control Act, the Federal Clean Water Act, and applicable regulations prior to discharge. The current operations of the facility and effluent monitoring shows the discharge to be of far better quality than the permitted limitations for all current parameters; for example, chlorine residual equals 0.0 mg/L, ammonia equals 0.04 mg/L, and BOD₅ and TSS are less than 10 mg/L. Therefore, Section S1.E of the city's discharge permit will be modified to extend the compliance date for meeting final metals effluent limitations from December 31, 2003 to December 31, 2004.